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27 The County of Marin

28 IN THE UNITED STATES DISTRICT COURT

1 FOR THE NORTHERN DISTRICT OF CALIFORNIA

2 JACQUELYN HALL, ARIANA MARTINEZ,
3 KARLA FERNANDEZ and CHAVON
4 WHITE, for themselves and all others
5 similarly situated,

6 Plaintiffs,

7 vs.

8 HOUSING AUTHORITY OF THE COUNTY
9 OF MARIN, and DOES 1 through 100,
10 INCLUSIVE,

11 Defendants.

12 Case No.: C 12-04922 RS

13 STIPULATION (~~PROPOSED~~) RE CHANGES
14 TO SCHEDULING ORDER RE MOTIONS
15 AND DISCOVERY, AS MODIFIED BY THE
16 COURT

17 Judge: Honorable Richard Seeborg
18 Date Action Filed: September 20, 2012
19 Trial Date: July 13, 2014

The parties to the above-entitled action jointly submit this PROPOSED STIPULATION RE SCHEDULING DATES FOR MOTIONS AND DISCOVERY as requested by the Court when it reassigned Plaintiffs' Motion to Compel and To Reschedule Motion for Class Certification to Magistrate Judge Corley. The parties negotiated preliminary changes, but had to await Judge Corley's Order on the Motion to Compel for the Stipulation Could be finalized. Judge Corley held the hearing on the Motion to Compel on October 17, and issued her Order Granting in Part Motion to Compel on October 18. That Order required, in part, the parties to negotiate the terms of a notice to tenants regarding the production, and for Defendant to perform substantial work by October 30. As a result, the parties have been unable to finalize the instant Stipulation until now.

The parties accordingly respectfully submit the following proposed changes to the Court's initial Scheduling Order to take into account the effect of the productions ordered by Judge Corley, as modified by the parties' subsequent agreements re production, and request that the Court confirm the terms of the Stipulation. (The parties have agreed that the dates set forth below for "Dispositive Motions" are the last possible date for the filing or hearing. The parties have also agreed, however, that the earliest either party can file the opening brief of a dispositive motion is February 22, the day after the last brief is due on the Class Certification Motion.)

Scheduling

	Current Dates	Proposed New Dates
Rule 26 Exchanges	March 22, 2013	
Fact Discovery		
Commencement	Jan. 15, 2013	
Conclusion	Nov. 27, 2013	March 28, 2014
End Discovery Motions	Dec. 3, 2013	April 4, 2014
Case Management Conference	December 12, 2013, 10:00 a.m	SAME
Expert Discovery		
Opening Reports Due	Jan. 10, 2014	April 4, 2014

1	Rebuttal Reports Due	Jan. 17, 2014	April 11, 2014
2	Close of Motions	Jan. 31, 2014	April 24, 2014
3	Class Certification		
4	Opening Brief	Aug. 16, 2013	Jan. 22, 2014
5	Opposition	Sept. 6 2013	Feb. 14, 2014
6	Reply	Sept. 18, 2013	Feb. 21, 2014
7	Hearing	Oct. 3, 2013	March 6, 2014
8	Dispositive Motions		
9	Opening Briefs	Jan. 24, 2014	April 17, 2014
10	Opposition Briefs	Feb. 14, 2014	May 8, 2014
11	Reply Briefs	Feb. 27, 2014	May 21, 2014
12	Hearing	March 14, 2014	June 5, 2014
13	Pretrial Conference	July 3, 2014 at 10:00 a.m.	SAME
14	Trial Date	July 14, 2014 at 9:00 a.m.	SAME
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Dated: November 6, 2013

SOMMERS & SCHWARTZ, LLP

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s/FFS

By: Frank Sommers, Attorneys Plaintiffs
 Jacquelyn Hall, Ariana Martinez, Karla
 Fernandez and Chavon White

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2 Dated: November 6, 2013
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CHOLAKIAN & ASSOCIATES
A Professional Corporation

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7 s/CHJ _____
8 By: Colin H. Jewell, Attorneys for Defendant
9 Housing Authority of the County of Marin
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SO ORDERED

Dated: 11/8, 2013



Hon. Richard Seeborg
U.S. District Court Judge